

(Rev. 5/05)

**FORM TO BE USED BY A PRISONER IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

(1) Keenan Wright 431055
 (Name of Plaintiff) (Inmate Number) , 9947:

23207 Dupont Blvd Georgetown
 (Complete Address with zip code)

(2) Raymond E. Blake 377092
 (Name of Plaintiff) (Inmate Number)

- 07-783 -

(Case Number)
 (to be assigned by U.S. District Court)

23207 Dupont Blvd. Georgetown, DE.
 (Complete Address with zip code) 19947.

(Each named party must be listed, and all names
 must be printed or typed. Use additional sheets if needed)

1. C/C means
 2. STAFF Lt. Michael Costello
 3. Sussex Community Correctional Center
 4. C.M.S. - Correction Medical Service
 5. Cpl. Richard Calvert
 6. Carl C. (Names of Defendants)
 7. Robert George
- (Each named party must be listed, and all names
 must be printed or typed. Use additional sheets if needed)

CIVIL COMPLAINT

(408)

Jury Trial Requested

| | |
|---|--|
| FILED | |
| DEC - 9 2007 | |
| U.S. DISTRICT COURT DISTRICT OF DELAWARE | |

I. PREVIOUS LAWSUITS

- A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

N/0

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II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution? Yes • No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims? Yes • No
- C. If your answer to "B" is Yes:

1. What steps did you take? We filed several grievances and negative results were brought forth at all levels.
 2. What was the result? Negative results.
-

- D. If your answer to "B" is No, explain why not: 1/A
-

III. DEFENDANTS (in order listed on the caption)

(1) Name of first defendant: Correctional officer J. Mears

Employed as Correctional officer at S.V.O.P

Mailing address with zip code: 23207 Dupont Blvd. Georgetown, DE. 19947

(2) Name of second defendant: Micheal costello

Employed as Staff Lieutenant at S.V.O.P

Mailing address with zip code: 23207 Dupont, Blvd. Georgetown, DE. 19947

(3) Name of third defendant: Sussex community correctional center

Employed as Entire organization at Entire organization

Mailing address with zip code: 23207 Dupont, Blvd. Georgetown, DE. 19947

(List any additional defendants, their employment, and addresses with zip codes, on extra sheets if necessary)

4. (name) C. M. S - correctional medical service

Employed as medical service at S.V.O.P

Mailing 23207 Dupont, Blvd. Georgetown, DE. 19947

5. (name) Cpl. Richard calvert

Employed as Corporal at S. V. O.P

Mailing 23207 Dupont, Blvd. Georgetown, DE. 19947

IV. STATEMENT OF CLAIM

(State as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets of paper if necessary.)

1. on 10-23-07 Richard Calvert maced petitioner Keenan Wright and beat him with the can of mace so hard and bad that keenan wright had to receive intensive medical treatment/ Since 11-1-07 Raymond E. Blake was forced to drink must water up until his release date 2-5-08 causing him to receive intensive medical treatment. c/o mears, staff lt. costello, warden Robert George etc. Denied petitioner's access to the telephones to contact their attorneys. They denied access to legal information and threatened to bring forth bodily harm
2. to petitioner's. the petitioner's received intensive sanctions in the s.v.o.p facility for no reason at all. And their was intensive retaliation inflicted on both petitioner's when the abuse was grieved.
3. to petitioner's. the petitioner's received intensive sanctions in the s.v.o.p facility for no reason at all. And their was intensive retaliation inflicted on both petitioner's when the abuse was grieved.

V. RELIEF

(State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. We want to be compensated for punitive and compensatory damages for the abuse that we suffered in the amount of \$1,000,000.00 (One million Dollars per defendant).

2. on - 11-21-07 to 12-07-07 Theodore Rollins was forced to drink rust water by all above mentioned Defendants.

on 11-9-07 to 12-07-07 Takoma Medley was forced to drink rust water by all above mentioned Defendants.

3. on 11-1-07 to 11-28-07 Karl Owens was forced to drink rust water by all above mentioned Defendants.

All Petitioner's suffered massive injuries from All said- Above mentioned Defendant's who were in a culpable state of mind. Defendant's deliberately inflicted massive amounts of injuries to Petitioner's.
I declare under penalty of perjury that the foregoing is true and correct.

Signed this 25th day of November, 2007.

① Keenan Wright

(Signature of Plaintiff 1)

② Theodore Rollins

(Signature of Plaintiff 2)

③ Takoma N. Medley Sr.

(Signature of Plaintiff 3)

④ Karl Owens

⑤ Raymond C. Blake

⑥ _____

4

⑦ _____

3) Name: Theodore Rollins Inmate #: 392812

complete Address: 38 Todd's Lane Wilmington, DE. 19802

4) Name: Takoma Medley Inmate # 257334

Complete Address: 308 Oak Rd. Seaford, DE. 19973

5) Name: Karl Owens Inmate #: 428918

Complete Address: 38 Todd's Lane Wilmington, DE.
19802

Additional Defendant(s)

(6) Name: Robert George

Employed As: Warden at S.V.O.P

Mailing address: 23207 Dupont, Blvd. Georgetown, DE.
19947

7.) Name: Carl C. Danberg

Employed as: Commissioner of Corr. at Dover

Mailing address: 245 McKee RD. Dover, DE. 19904

8.) Name: Richard Norwood

Employed as: Sergeant at SVOP

Mailing address: 23207 Dupont Blvd. Georgetown, DE. 19947

*9.) Name: Adams

Employed as: Corrol at SVOP

Mailing address: 23207 Dupont Blvd. Georgetown, DE. 19947

10.) Name: Hanna

Employed as: Correctional Officer at SVOP

Mailing address: 23207 Dupont Blvd. Georgetown, DE. 19947

11.) Name: Hineline

Employed as: Sergeant at SVOP

Mailing address: 23207 Dupont Blvd. Georgetown, DE. 19947

12.) Name: Spanier

Employed as: Sergeant at SVOP

Mailing address: 23207 Dupont Blvd. Georgetown, DE. 19947

To: Mr. Warden George,

My name is Raymond E. Blake and I'm writting you on behalf of myself and the rest of the residents here at this SROP facility. Mr. Warden we have a serious problem that needs to be addressed immediately!

The water here at your facility has just in it and it's a serious human health hazard. I along with several other residents of this facility have complained to your staff team and they're all directing the complaints to you and the maintenance people. We've written several grievances about this dire emergency and to return with negative results; no one responded! You're made aware now and if you don't solve this problem we'll get the ^{R.I.} promise!

witnesses who were and still are affected by this SROP Rusty water.

| NAME | SBI # | POD | DATE |
|------------------------|-----------|----------|----------|
| Anthony D. Gaines | 217795 | Pod - 10 | 11/9/07 |
| David J Leavitt | 588400 | Pod - 10 | 11/9/07 |
| W. W. Wi | 140789 | Pod, 10 | 11-09-07 |
| 1 Alden L. Common | 281691 | Pod - 10 | 11-09-07 |
| ISAIAH Smiley | 309273 | POD - 10 | 11-09-07 |
| Donald G. Hamaker, Jr. | 402635 | Pod - 10 | 11-09-07 |
| F. Duayne Boardley | 4184-8741 | Pod - 10 | 11/09/07 |
| F. Duayne Boardley | 497031 | Pod - 10 | 11-09-07 |
| Keynan Hunter | 442215 | Pod - 10 | 11-09-07 |
| Michael Lambert | 349010 | Pod - 10 | 11-09-07 |
| Lorenzo Blue | 498-236 | Pod 10 | 11-09-07 |
| Michael Washington | 442610 | POD 10 | 11-09-07 |
| Jayare Watson | 441638 | Pod 10 | 11-09-07 |
| Keith Taylor | 582538 | Pod 10 | 11-09-07 |
| Joseph Wallace | 498-424 | pod 10 | 11-9-07 |
| Charles LeClerk | 209822 | #7 | 11-9-07 |
| MARTY ROBERTS | 174059 | #7 | 11-9-07 |
| Sorome Bell | 088217 | 7 | 11-9-07 |
| Keith Maye | 444911 | 7 | 11-9-07 |
| David L. Johnson | 453891 | Pod - 9 | 11-9-07 |
| David Preston III | 543791 | Pod b | 11-9-07 |

| Name | Case # | Pod | Date |
|---------------------------|---------|---------|----------|
| 1. Tyrone Fisher | 454802 | Pod 6 | 11-9-07 |
| 2. Carlos A. Ortiz | 356803 | Pod 7 | 11-9-07 |
| 3. Robert Collins | 301629 | Pod 7 | 11-9-07 |
| 4. Wagner Wilson | 435754 | Pod 7 | 11-9-07 |
| 5. Michael Allen | 310099 | Pod 6 | 11-9-07 |
| 6. Keith Lawson | 341937 | Pod 9 | 11-9-07 |
| 7. Ricky Truitt | 228532 | Pod 10 | 11-9-07 |
| 8. Marvin Hicks | 0581340 | Pod 10 | 11-9-07 |
| 9. William Moore | 245651 | Pod 10 | 11-9-07 |
| 10. Daniel Davis | 255781 | Pod 10 | 11-9-07 |
| 11. Chris Eges | 566719 | Pod 10 | 11-9-07 |
| 12. Robert Bruffo | 544981 | Pod 10 | 11-9-07 |
| 13. PATRICK N. DEVONSHIRE | 488531 | " " | 11-9-07 |
| 14. Manuel Vazquez | 573109 | Pod #10 | 11-9-07 |
| 15. Ernest Jones | 529043 | Pod #10 | 11-9-07 |
| 16. Lourau Jones | 569021 | Pod #10 | 11-9-07 |
| 17. Damon Jones | 494346 | Pod #9 | 11-15-07 |
| 18. | | | |
| 19. | | | |
| 20. | | | |

| NAME | CASE NUMBER | FILED | PAGE |
|----------------------|-------------|-------|----------|
| 1. Vernon Moon | 465076 | #9 | 11/16/07 |
| 2. Dennis Wright | 431053 | #1 | 11-22-07 |
| 3. Chad My | 295970 | #1 | 11-22-07 |
| 4. Danny Dose | 576292 | #1 | 11-22-07 |
| 5. Anthony Watkins | — | #1 | 11-22-07 |
| 6. Rodney Scarboro | — | #1 | 11-22-07 |
| 7. Rich Hogan | 207204 | #1 | 11-22-07 |
| 8. James Pettis | 185146 | #1 | 11/22/07 |
| 9. William O'Donnell | 500434 | #1 | 11/22/07 |
| 10. Henry Ross | 459418 | #1 | 11/22/07 |
| 11. Jerome Medley | 257334 | #1 | 11/22/07 |
| 12. Orlando Bland | 257424 | #1 | 11/22/07 |
| 13. Karl Givens | 428-918 | #1 | 11/22/07 |
| 14. Theodore Collins | 392812 | #1 | 11/22/07 |
| 15. | | | |
| 16. | | | |
| 17. | | | |
| 18. | | | |

FORM #584GRIEVANCE FORM

FACILITY: SVOP DATE: 11/6/07
 GRIEVANT'S NAME: Raymond E. Blake SBI#: 377092
 CASE#: N/A 11-07-254 TIME OF INCIDENT: ON GOING
 HOUSING UNIT: POD #10

BRIEFLY STATE THE REASON FOR THIS GRIEVANCE. GIVE DATES AND NAMES OF OTHERS INVOLVED IN THE INCIDENT OR ANY WITNESSES.

To whom it may concern,
 My name is Raymond E. Blake and I am writing in regards to this unsanitary health risk to human beings water here at this SVOP facility. This water turned my wash clothe green and I believe it's the cause to my kidneys hurting every night. It's causing my back to break out in hives and my skin is peeling off on my legs as well. I'm scared to drink the liquids from this facility and liquids are essential to the human survival.

ACTION REQUESTED BY GRIEVANT: Please Respond immediately!

GRIEVANT'S SIGNATURE: Ray Blake DATE: 11/6/07

WAS AN INFORMAL RESOLUTION ACCEPTED? (YES) X (NO)

(COMPLETE ONLY IF RESOLVED PRIOR TO HEARING)

GRIEVANT'S SIGNATURE: _____ DATE: _____

WORK ORDER
SUBMITTED
11/6/07
X

FORM #584GRIEVANCE FORM

FACILITY: SVP DATE: 11-16-07
 GRIEVANT'S NAME: Raymond E. Blake SBI#: 377092
 CASE#: 1/4 V-07-264 TIME OF INCIDENT: on going problem
 HOUSING UNIT: H-Q

BRIEFLY STATE THE REASON FOR THIS GRIEVANCE. GIVE DATES AND NAMES OF OTHERS INVOLVED IN THE INCIDENT OR ANY WITNESSES.

To whom it may concern,

I'm writing because you people keep cutting the phone lines off hindering me from communicating with my attorney. This is a clear Federal violation of my Sixth and eighth Amendment right. I'm tired of this mistreatment and I've written letters to Ruth Ann Miner and Carl C. Danberg, making them aware of this ongoing situation.

ACTION REQUESTED BY GRIEVANT: Please investigate and/or respond to this plain violation.

GRIEVANT'S SIGNATURE: Ray Blake DATE: 11-16-07

AS AN INFORMAL RESOLUTION ACCEPTED? (YES) (NO)

(COMPLETE ONLY IF RESOLVED PRIOR TO HEARING)

GRIEVANT'S SIGNATURE: _____ DATE: _____

UNRESOLVED, YOU ARE ENTITLED TO A HEARING BY THE RESIDENT GRIEVANCE COMMITTEE.

*Not Grieveable
Phones are
privileged*

FORM #584GRIEVANCE FORM

FACILITY: SVOP DATE: 11-16-07
 GRIEVANT'S NAME: Raymond E. Blake SBI#: 377092
 CASE#: 1A 11-07-267 TIME OF INCIDENT: on going Problem
 HOUSING UNIT: #9

BRIEFLY STATE THE REASON FOR THIS GRIEVANCE. GIVE DATES AND NAMES OF OTHERS INVOLVED IN THE INCIDENT OR ANY WITNESSES.

To whom it may concern;
 my name is Raymond E. Blake and I'm writing in regards to 11-13-07. The day when staff Lt. Costello came to notify the pods that the water was being treated and tested. Mr. Costello informed the pods that the water was safe to drink and that we needed to keep it running for at least a half hour. Well it's still causing my kidneys to hurt and it still looks and taste like rust. what's going on here?

ACTION REQUESTED BY GRIEVANT: Please investigate this problem and get outside help on this issue!

GRIEVANT'S SIGNATURE: Ray Blake DATE: 11-16-07

IS AN INFORMAL RESOLUTION ACCEPTED? (YES) (NO)

(COMPLETE ONLY IF RESOLVED PRIOR TO HEARING)

GRIEVANT'S SIGNATURE: _____ DATE: _____

REPORT SET
V-07-254
DATED 11/10/07
S

FORM #584

GRIEVANCE FORMFACILITY: SVOP DATE: 11-20-07GRIEVANT'S NAME: Raymond E. Blake SBI#: 377092CASE# 11A V-07-276 TIME OF INCIDENT: ON GOING Problem!HOUSING UNIT: 202 #9

BRIEFLY STATE THE REASON FOR THIS GRIEVANCE. GIVE DATES AND NAMES OF OTHERS INVOLVED IN THE INCIDENT OR ANY WITNESSES.

To whom it may concern,

my name is Raymond E. Blake and I'm writing in regards to the ongoing mistreatment that I am receiving here at this SVOP facility. I was written up by C/I J. Morris on 11-13-07 for disorderly behavior, because I asked him to cut the pay phones out so I could contact my attorney. I went to the MOT board today and sgt. Norwold, Lt. Costello, and Mr. Adams found me guilty of the charge without me ever getting the opportunity to face my accuser. They never told me my rights and they never allowed me to appeal the decision. This is wrong and I feel like I'm being retaliated against, because I confronted the warden about this rust in the water. It's illegal to deny unsentenced detainees access to the telephones!

ACTION REQUESTED BY GRIEVANT:

I would like to have an intense investigation on this whole ordeal. I would like to have a response at your earliest convenience!

GRIEVANT'S SIGNATURE: Ray Blake DATE: 11-20-07WAS AN INFORMAL RESOLUTION ACCEPTED? (YES) (NO)

(COMPLETE ONLY IF RESOLVED PRIOR TO HEARING)

GRIEVANT'S SIGNATURE: _____ DATE: _____

*Discipline
not issue
J*

FORM #584

GRIEVANCE FORM

FACILITY: SVOP
GRIEVANT'S NAME: Raymond E. Blake
CASE#: ~~SV~~ V-07-219
HOUSING UNIT: POD # 1

DATE: 11-21-07

SBI#: 37709

TIME OF INCIDENT: on going Problem!

BRIEFLY STATE THE REASON FOR THIS GRIEVANCE. GIVE DATES AND NAMES OF OTHERS INVOLVED IN THE INCIDENT OR ANY WITNESSES.

To whom it may concern,
I'm writing because I am receiving an ongoing retaliation and
or harassment from Staff Lt. Castello. Staff Lt. Castello wrote
me up because I wrote him a letter asking him to enter an
Appeal from the MDT board's decision in which they found me guilty of
Disorderly behavior for asking an officer to utilize the telephone to
contact my attorney. I read my manual and it clearly says to write him if
you have problems with the MDT Board. He moved me to Pod #1 sanction
pool and told me that he's going to kill me real soon!

ACTION REQUESTED BY GRIEVANT: Please help me, because I'm in fear of my life. I feel like staff Lt. Castello and the warden are trying to kill me, because I documented the many of violations in this building to the district court.

GRIEVANT'S SIGNATURE: Kay Blake

DATE: 11-21-07

WAS AN INFORMAL RESOLUTION ACCEPTED? _____ (YES) _____ (NO)

(COMPLETE ONLY IF RESOLVED PRIOR TO HEARING)

GRIEVANT'S SIGNATURE: _____

DATE:

IF UNRESOLVED, YOU ARE ENTITLED TO A HEARING BY THE RESIDENT GRIEVANCE COMMITTEE.

**cc: INSTITUTION FILE
GRIEVANT**

witnesses

531#
374876
350269

April '97 REV

| <u>Name</u> | <u>SDI #</u> |
|-------------------|--------------|
| 5. Eric Teel | 394874 |
| 6. Oscar Jones | 194925 |
| 7. Ronald Cannon | 503250 |
| 8. William O'Neal | 5150 |

FORM #584GRIEVANCE FORMFACILITY: SVOPDATE: 11-22-07GRIEVANT'S NAME: Raymond E. BlakeSBI#: 377092CASE#: NIA V-07-281TIME OF INCIDENT: on going Problem!HOUSING UNIT: POD #1

BRIEFLY STATE THE REASON FOR THIS GRIEVANCE. GIVE DATES AND NAMES OF OTHERS INVOLVED IN THE INCIDENT OR ANY WITNESSES.

To whom it may concern,

I'm writing for documentation of the on going retaliation that I'm receiving from Warden Robert George's staff team. Every since I've complained about warden George mistreating me and my fellow SVOP residents by making us drink rust water. I've been getting attacked by STAFF LT. COSTELLO and the rest of their goons! They've placed me on a sanction pod preventing me from contacting my attorney or family members. They've threatened to mase me and kill my Nigger ASS on several occasions. I'm in fear for my life down here and I've contacted RUTHANN Carl C. Denberg and the Internal Affairs about this mistreatment.

ACTION REQUESTED BY GRIEVANT:

Please investigate this on going Retaliation that I am receiving at this SVOP Facility. Thanks for your time & patience.

GRIEVANT'S SIGNATURE: Ray BlakeDATE: 11-22-07WAS AN INFORMAL RESOLUTION ACCEPTED? (YES) (NO)

(COMPLETE ONLY IF RESOLVED PRIOR TO HEARING)

GRIEVANT'S SIGNATURE: _____

DATE: _____

IF UNRESOLVED, YOU ARE ENTITLED TO A HEARING BY THE RESIDENT GRIEVANCE COMMITTEE.

cc: INSTITUTION FILE
GRIEVANT

Raymond E. Blake
SB # 377092
23207 Dupont Blvd. Georgetown DE
19947



Clerk of the Office
U.S. District Court
LOCK Box 18
844 N. King Street
Wilmington, DE 19801

FIRST CLASS MAIL

U.S.M.S.
X-RAY